

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. RENÉE MARIE BUMB
THIS DOCUMENT RELATES TO: <i>Roberts v. Zhejiang Huahai Pharmaceutical Co. Ltd.,</i> Case No. 1:19-md-02875-RMB-SAK	

**CERTIFICATION OF ADAM M. SLATER IN
SUPPORT OF PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE
THE OPINIONS OF DEFENSE EXPERT ANDREW THOMPSON, PH.D.**

ADAM M. SLATER, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to exclude the testimony of Defense Expert Andrew Thompson, Ph.D.

2. Attached hereto as **Exhibit 1** is a true and accurate copy of Andrew Thompson's April 10, 2025 report in this case.

3. Attached hereto as **Exhibit 2** is a true and accurate copy of Andrew Thompson's May 9, 2025 deposition transcript in this case.

4. Attached hereto as **Exhibit 3** is a true and accurate copy of the relevant page of Eric Gu's April 5, 2021 deposition transcript in this case.

5. Attached hereto as **Exhibit 4** is a true and accurate copy of FDA, Guidance for Industry, *Genotoxic and Carcinogenic Impurities in Drug Substances and Products: Recommended Approaches* (Dec. 2008).

6. Attached hereto as **Exhibit 5** is a true and accurate copy of the relevant page of ZHP's ZnCl₂ DMF, Impurities Section (HUAHAI-US00007898).

7. Attached hereto as **Exhibit 6** is a true and accurate copy of the relevant excerpts of the transcript of Peng Dong's March 29, 2021 deposition in this case.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of ZHP's translation of Jinsheng Lin's July 27, 2017 email regarding the NDMA contamination of ZHP's valsartan (ZHP00190573).

9. Attached hereto as **Exhibit 8** is a true and accurate copy of the transcript of Min Li's April 20, 2021 deposition in this case.

10. Attached hereto as **Exhibit 9** is a true and accurate copy of Plaintiffs' translation of Jinsheng Lin's July 27, 2017 email regarding the NDMA contamination of ZHP's valsartan (ZHP00190573).

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: May 22, 2025